

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DISTRICT**

ALEXANDRE LAING,)	
)	
Petitioner/Counter-Defendant,)	Case No. 1:24-cv-10901
)	
v.)	Judge April M. Perry
)	
JACLYN FORTINI LAING,)	Magistrate Judge Maria Valdez
)	
Respondent/Counter-Plaintiff.)	

**UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL
EXHIBITS 4 AND 6 TO RESPONDENT’S COUNTERCLAIM**

Pursuant to Local Rule 26.2 of the Local Rules of the United States District Court for the Northern District of Illinois, Respondent/Counter-Plaintiff Jaclyn Fortini Laing (“Respondent”), by and through her counsel, hereby moves this Court for entry of an Order granting leave to file under seal Exhibits 4 and 6 to her Counterclaim. In support, Respondent states as follows:

1. On December 6 2024, Respondent filed her Answer, Affirmative Defenses, and Counterclaim (“Counterclaim”) to the Verified Complaint and Petition For Return of the Child[ren] to France filed by Petitioner Alexandre Laing (“Petitioner”).

2. Exhibits 4 and 6 to the Counterclaim are translated versions of documents originally filed by Petitioner in French court, and both exhibits contain the full names and birthdates of the parties’ minor children. Under Fed. R. Civ. P. 5.2(a), such information must be redacted.

3. Under Local Rule 26.2(c), “[a]ny party wishing to file a document or portion of a document electronically under seal in connection with a motion, brief or other submission must ... file a motion with the court.” L.R. 26.2(c).

4. In compliance with Local Rule 26.2(c), Respondent will promptly file a public-record version of Exhibits 4 and 6.

5. On December 6, 2024, the undersigned counsel for Respondent conferred with counsel for Petitioner, who stated that he does not oppose the relief requested in this motion.

WHEREFORE, for the foregoing reasons, Respondent respectfully requests that this Court enter an Order granting leave for Respondent to file Exhibits 4 and 6 of her Counterclaim under seal.

Dated: December 6, 2024

Respectfully Submitted,

JACLYN FORTINI LAING

By: /s/ Rachel Ellen Simon
One of her Attorneys

Mary Eileen Cunniff Wells
Rachel Ellen Simon
MILLER SHAKMAN LEVINE & FELDMAN LLP
30 W. Monroe St., Suite 1900
Chicago, IL 60603
(312) 273-3700
mwells@millershakman.com
rsimon@millershakman.com